

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

WHITEHORSE DUCHARME,  
a/k/a STANLEY DUCHARME

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 18 U.S.C. §§ 2241(c) and 1152

**COUNT ONE**

**Aggravated Sexual Abuse of a Minor**

The Grand Jury Charges:

In or about 2004, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

WHITEHORSE DUCHARME, a/k/a STANLEY DUCHARME,  
did knowingly engage in and attempt to engage in a sexual act with a person who had not attained the age of 12 years, namely, T.G., an Indian child, and the sexual act consisted of contact between the mouth of T.G. and the penis of WHITEHORSE DUCHARME, a/k/a STANLEY DUCHARME;

In violation of Title 18, United States Code, Sections 2241(c) and 1152.

COUNT TWO

**Aggravated Sexual Abuse of a Minor**

The Grand Jury Further Charges:

From in or about 2009 until in or about 2014, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

WHITEHORSE DUCHARME, a/k/a STANLEY DUCHARME, did knowingly engage in and attempt to engage in a sexual act with a person who had not attained the age of 12 years, namely, L.W., an Indian child, and the sexual act consisted of the intentional touching of the genitalia, not through the clothing, of L.W. with an intent to abuse, humiliate, harass, degrade, arouse, and gratify the sexual desires of any person;

In violation of Title 18, United States Code, Sections 2241(c) and 1152.

COUNT THREE

**Aggravated Sexual Abuse of a Minor**

The Grand Jury Further Charges:

In or about 2014 until in or about 2016, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

WHITEHORSE DUCHARME, a/k/a STANLEY DUCHARME, did knowingly engage in and attempt to engage in a sexual act with a person who had not attained the age of 12 years, namely, M.D., an Indian child, and the sexual act consisted of contact between the mouth of M.D. and the penis of WHITEHORSE DUCHARME, a/k/a STANLEY DUCHARME;

In violation of Title 18, United States Code, Sections 2241(c) and 1152.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Drew H. Wrigley

DREW H. WRIGLEY

United States Attorney

DMD/vt